

MORRISON | FOERSTER

250 WEST 55TH STREET
NEW YORK, NY 10019-9601

TELEPHONE: 212.468.8000
FACSIMILE: 212.468.7900

WWW.MOFO.COM

MORRISON & FOERSTER LLP

BEIJING, BERLIN, BOSTON,
BRUSSELS, DENVER, HONG KONG,
LONDON, LOS ANGELES, NEW YORK,
NORTHERN VIRGINIA, PALO ALTO,
SAN DIEGO, SAN FRANCISCO, SHANGHAI
SINGAPORE, TOKYO, WASHINGTON, D.C.

April 28, 2023

By ECF and Hand Delivery

The Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *United States v. Sylvia Ash*, 19 Cr. 780 (LAK)

Dear Judge Kaplan:

We respectfully submit this letter on behalf of defendant Sylvia Ash in connection with the above-referenced matter. We hereby request a modification of the deadline for Ms. Ash to make final payment of the fine imposed by the Court, which is due on May 1, 2023. We request that she be permitted to pay the remainder in installments between now and August 1, 2023. We make this request with the consent of the government.

Ms. Ash is currently incarcerated at FPC Anderson in West Virginia, with a release date of June 20, 2023. Despite her incarceration, she has stayed current on her fine payments and, as of this week, has paid \$5,000 of her final \$35,000 payment due May 1. The funds for this payment came from selling certain personal property. However, to make up the difference, Ms. Ash had hoped to sell real property she jointly owns with her siblings. This property was put on the market in August 2022, but the sale did not proceed, and the property was taken off the market by her siblings in January. Ms. Ash will be in a far better position to liquidate assets and make funds available when she is out of custody. Accordingly, we respectfully request that she be permitted to pay the remaining balance of \$30,000 as follows: \$5,000 to be paid June 1, 2023; \$10,000 to be paid July 1, 2023; and the final \$15,000 to be paid August 1, 2023.

MORRISON | FOERSTER

The Honorable Lewis A. Kaplan
April 28, 2023
Page Two

We have communicated with the government about this proposal and the government consents to the request.

Respectfully submitted,

/s/ Nathan Reilly

Nathan Reilly

cc: Counsel of record (by ECF and email)